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Addendum StartPage: 0

SOAH CONSOLIDATED DOCKET NO. 473-19-1265
PUC CONSOLIDATED DOCKET NO. 48785

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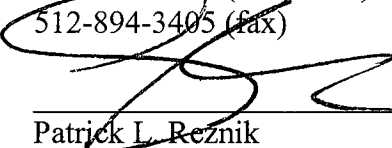
APPLICATION OF ONCOR § BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY §
LLC, AEP TEXAS INC., AND LCRA §
TRANSMISSION SERVICES §
CORPORATION TO AMEND §
THEIR CERTIFICATES OF § OF
CONVENIENCE AND NECESSITY §
FOR 345-KV TRANSMISSION §
LINES IN PECOS, REEVES, AND §
WARD COUNTIES, TEXAS (SAND §
LAKE TO SOLSTICE AND §
BAKERSFIELD TO SOLSTICE) § ADMINISTRATIVE HEARINGS

**DIRECT TESTIMONY OF INTERVENOR FORRISTER GENERATION-
SKIPPING TRUST**

Intervenor Forrister Generation-Skipping Trust ("Forrister") files this Direct Testimony, which is attached. Forrister stipulates that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

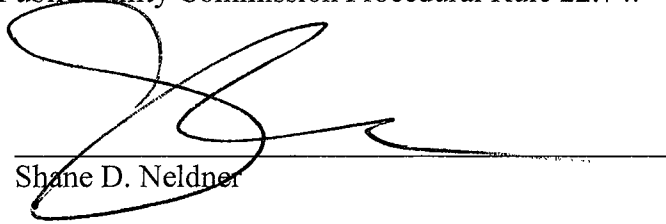
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**ATTORNEYS FOR FORRISTER
GENERATION-SKIPPING TRUST**

CERTIFICATE OF SERVICE

I certify that a copy of this document has been served on all parties of record on January 9, 2019 in accordance with Public Utility Commission Procedural Rule 22.74.



Shane D. Neldner

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1 **I. INTRODUCTION**

2
3 QUESTION: PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE
4 RECORD.

5
6 ANSWER: Forrister Generation-Skipping Trust
7 Dwight Forrister, Trustee
8 4516 Seton Center Parkway, Suite 135
9 Austin, Texas 78759
10

11 QUESTION: ARE YOU AN INTERVENOR IN SOAH CONSOLIDATED DOCKET
12 NO. 473-19-1265 AND PUC CONSOLIDATED DOCKET NO. 48785 AND ON
13 WHOSE BEHALF ARE YOU TESTIFYING?

14
15 ANSWER: Yes and I am testifying on behalf of Forrister Generation-Skipping Trust.

16
17 QUESTION: HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY
18 COMMISSION OF TEXAS ("PUC" OR "COMMISSION") PROCEEDING?

19
20 ANSWER: No.

21
22 QUESTION: WHERE ARE YOUR PROPERTIES LOCATED?

23
24 ANSWER: The properties are located in Reeves County, Texas. Identified by Oncor
25 Electric Delivery Company LLC and AEP Texas Inc. ("Oncor & AEP") as tracts 232 and
26 233. Tract 232 is at the intersection of FM 869 and CR 339. Tract 233 fronts FM 869 to
27 the intersection with CR 339. **See Exhibit A.**

28
29 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTIES?

30
31 ANSWER: I have owned the properties for about four years.

32
33 QUESTION: ARE YOU FAMILIAR WITH THE AREAS OF PECOS, REEVES AND
34 WARD COUNTIES, TEXAS?

35
36 ANSWER: Yes.

37
38 **II. PURPOSE AND SCOPE OF TESTIMONY**

39
40 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?
41

1 ANSWER: The purpose of my testimony is to (a) describe my properties; (b) describe
2 the expected impact of the proposed transmission line on my properties; (c) voice my
3 opposition to any Route using Segment C-1 and proposed alternate Routes 370 and 404;
4 and voice my support for Oncor & AEP's Sand Lake to Solstice recommended Route
5 320.

6
7 QUESTION: WHAT ARE YOUR CONCERNS ABOUT THE PROPOSED
8 TRANSMISSION LINE USING ONCOR & AEP'S ALTERNATE ROUTES 370 AND
9 404 AND SEGMENT C-1?

10
11 ANSWER: In general, I am opposed to the construction of Oncor & AEP's transmission
12 line through my community because of the following: (1) a 345-kV transmission line will
13 severely depreciate the value of my properties; (2) a 345-kV transmission line will
14 severely detract from the scenic beauty and aesthetic values of my properties and
15 surrounding area; (3) a 345-kV transmission line would negatively impact community,
16 economic and historical values and character of my properties and surrounding area; (4) I
17 and visitors will have to drive under or near a 345-kV transmission line on a regular
18 basis; (5) for transmission lines crossing my properties, I would be required to give third
19 parties access to my properties, which limits the privacy and control over my properties;
20 and (6) I have general concerns about any buzzing of the 345-kV transmission line and
21 general health and safety concerns and concerns living and being close to a 345-kV
22 transmission line.

23
24 **III. DESCRIPTION OF PROPERTIES AND THE LINE'S IMPACT**

25
26 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE
27 PROPERTIES?

28
29 ANSWER: Yes there are multiple barns and storage sheds on the properties. There is one
30 house that is currently leased and a large metal building which is also leased.

31
32 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO
33 IMPROVE OR RESTORE THE LAND?

1 ANSWER: Yes, we have cleaned debris and drilled water wells.

2

3 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTIES?

4

5 ANSWER: Yes, there are several water wells at various locations on the properties.

6

7 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTIES?

8

9 ANSWER: No gas wells. There is one oil well and a new well that will be drilled on the
10 southern part of tract 233 where Segment C-1 would cross.

11

12 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTIES?
13 IF SO, DESCRIBE THEIR GENERAL LOCATIONS.

14

15 ANSWER: Yes there are about 20 different pipeline easements crossing the properties in
16 various locations.

17

18 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR
19 PROPERTIES IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES
20 PREVIOUSLY DESCRIBED.

21

22 ANSWER: Yes, there is a planned disposal well on tract 233 where the proposed
23 Segment C-1 will cross the property, and the line would likely take the anticipated
24 disposal well permit. There is also a service yard which could be impacted.

25

26 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES
27 CROSS YOUR PROPERTIES? IF SO, PLEASE DESCRIBE HOW AND WHERE
28 THEY CROSS THE PROPERTIES.

29

30 ANSWER: No, only normal distribution lines which supply the various structures with
31 electricity.

32

33 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES
34 ON YOUR PROPERTIES? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY
35 CROSS THE PROPERTIES.

36

37 ANSWER: Not at this time.

38

1 QUESTION: WOULD THE SEGMENTS THAT MIGHT IMPACT YOUR
2 PROPERTIES RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTIES?

3
4 ANSWER: Yes, Segment C-1 would run along the entire property boundary of tract 232
5 along the frontage of CR 339 and portion of tract 233, which also fronts CR 339. See
6 **Exhibit A.**

7
8 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE
9 IMPACT YOUR PROPERTIES AND THEIR OPERATIONS?

10
11 ANSWER: It could potentially impact the proposed oil well and disposal well which
12 have already been agreed to and will be constructed soon.

13
14 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE
15 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTIES.

16
17 ANSWER: Yes, on both parcels my tenants would have to drive under and around the
18 transmission lines daily.

19
20 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON ANY OF YOUR
21 PROPERTIES, DO YOU HAVE ANY CONCERNS ABOUT ONCOR & AEP
22 HAVING ACCESS TO YOUR PROPERTIES?

23
24 ANSWER: Yes, I have the general concerns of landowners who are required to give
25 third parties access to their property. Also, this would materially affect the use of my
26 properties. I hope that Oncor & AEP will respect my properties.

27
28 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTIES,
29 DO YOU HAVE ANY OTHER CONCERNS?

30
31 ANSWER: I have general safety and health concerns for living around transmission lines
32 and EMF issues. Because potential buyers may be aware of medical studies available on
33 the Internet arguing, correctly or not, a connection between high-powered transmission
34 lines causing health problems and possible cancer, we are concerned about a negative
35 stigma being attached to my properties and the possible devaluation of my property
36 values.

1
2 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE
3 ADMINISTRATIVE LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO
4 CONSIDER IN THIS PROCEEDING?

5
6 ANSWER: My plan is to develop more service yards on these properties. If ONCOR &
7 AEP utilize Segment C-1, it would impact this future plan.

8
9 **IV. CONCLUSION AND RECOMMENDATIONS**

10
11 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS
12 PROCEEDING REGARDING ONCOR & AEP's ROUTE 320 AND THE PROPOSED
13 ALTERNATE ROUTES?

14
15 ANSWER: I oppose Oncor & AEP's proposed alternate Routes 370 and 404. I also
16 oppose any Route using Segment C-1. I support recommended Route 320 as the route
17 that best meets the overall community values and PURA § 37.056(c)(4) and P.U.C.
18 SUBST. R. 25.101(b)(3)(B). Being very familiar with this area, we believe Route 320 is
19 the best route for the community and prudent avoidance.

20
21 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

22
23 ANSWER: Yes.
24



EXHIBIT
tabbles
A